

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE RUSSELL INVESTMENT COMPANY ) Lead C.A. No. 1:13-cv-12631-LTS  
SHAREHOLDER LITIGATION )  
) (Consolidated with No. 1:14-cv-14358-LTS  
)

**STIPULATION AND [PROPOSED] ORDER FOR DISMISSAL WITH PREJUDICE AS  
TO THE RUSSELL FUNDS**

Plaintiff Fred McClure ("Plaintiff"), defendant Russell Investment Management Company ("RIMCo"), defendant Russell Fund Services Company ("RFSC"), and nominal defendants Russell Commodity Strategies Fund, Russell Emerging Markets Fund, Russell Global Equity Fund, Russell Global Infrastructure Fund, Russell Global Opportunistic Credit Fund, Russell International Developed Markets Fund, Russell Multi-Strategy Alternative Fund, Russell Strategic Bond Fund, Russell U.S. Small Cap Equity Fund, and Russell Global Real Estate Securities Fund (the "Russell Funds"), through their undersigned counsel, hereby respectfully submit the Stipulation and [Proposed] Order for Dismissal with Prejudice as to the Russell Funds.

WHEREAS, Plaintiff filed the Verified Complaint (Document 1) in the *McClure I* Action<sup>1</sup> on October 17, 2013 against defendant RIMCo and the Russell Funds;

WHEREAS on December 8, 2014, Plaintiff filed the Verified Complaint in the *McClure II* Action<sup>2</sup> against defendants RIMCo and RFSC (Document 1);

WHEREAS on March 10, 2015, the *McClure I* and *McClure II* Actions were consolidated (Document 71);

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<sup>1</sup> "*McClure I* Action" refers to *McClure v. Russell Investment Management Company*, Case No. 1:13-cv-12631-LTS (D. Mass.).

<sup>2</sup> "*McClure II* Action" refers to *McClure v. Russell Investment Management Company, et al.*, Case No. 1:14-cv-14358 (D. Mass.).

WHEREAS, the parties agree to the dismissal of the Russell Funds from the above-consolidated action with prejudice;

WHEREAS, following the Court's approval of the dismissal of the Russell Funds, counsel for the Russell Funds agrees to accept service of any subpoena timely served so that the response date is prior to the close of the fact discovery deadline by Plaintiff on the Russell Funds.

NOW THEREFORE, IT IS STIPULATED AND AGREED by and between the undersigned, subject to the approval of the Court, that:

1. Plaintiff dismisses this action against the Russell Funds and dismisses all claims purportedly against the Russell Funds with prejudice, with each side to bear its own fees and costs.

STIPULATED AND AGREED TO BY:

Dated: May 12, 2015

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/s/ Edward B. Gerard

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*Counsel for Plaintiff Fred McClure*

Dated: May 12, 2015

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Russell Multi-Strategy Alternative Fund,  
Russell Strategic Bond Fund, Russell  
U.S. Small Cap Equity Fund, and Russell  
Global Real Estate Securities Fund*

Dated: May 12, 2015

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*Counsel for defendants Russell Investment  
Management Company and Russell Fund  
Services Company*

IT IS SO ORDERED.

DATED:

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HONORABLE LEO T. SOROKIN  
UNITED STATES DISTRICT JUDGE

1007458

**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2015 this document was filed through the Court's CM/ECF system and will be sent electronically to the registered participants identified in the Notice of Electronic Filing (NEF).

/s/ Edward B. Gerard

EDWARD B. GERARD